

Vincent A. D'Agostino (VAD-0120)  
Eric H. Horn (EH-2020)  
LOWENSTEIN SANDLER PC  
65 Livingston Ave.  
Roseland, NJ 07068  
Tel: 973.597.2500  
Fax: 973.597-2400

and

1251 Avenue of the Americas  
New York, New York 10020  
Tel: 212.262.6700  
Fax: 212.262.7402

Counsel to Cingular Wireless n/k/a AT&T Mobility LLC

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

Delphi Corporation, *et al.*,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

**RESPONSE OF CINGULAR WIRELESS N/K/A AT&T MOBILITY TO DEBTORS'  
NINETEENTH OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO 11 U.S.C. §  
502(b) AND FED. R. BANKR. P. 3007 TO CERTAIN (A) INSUFFICIENTLY  
DOCUMENTED CLAIMS, (B) CLAIMS NOT REFLECTED ON DEBTORS' BOOKS  
AND RECORDS, (C) UNTIMELY CLAIM, AND (D) CLAIMS SUBJECT TO  
MODIFICATION, TAX CLAIMS SUBJECT TO MODIFICATION, MODIFIED  
CLAIMS ASSERTING RECLAMATION, AND CONSENSUALLY  
MODIFIED AND REDUCED CLAIMS**

Cingular Wireless, n/k/a AT&T Mobility LLC ("Cingular"), by and through its undersigned counsel, submits this response to the Debtors' Nineteenth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. §502(b) And Fed.R.Bankr.P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Untimely Claim, and (D) Claims Subject To Modification, Tax Claims Subject To

Modification, Modified Claims Asserting Reclamation, and Consensually Modified And Reduced Claims, (the “Objection”), and respectfully represents as follows:

### **BACKGROUND**

1. On October 8 and 14, 2005, the (the “Petition Dates”), the Debtors<sup>1</sup> filed their voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession under Bankruptcy Code sections 1107(a) and 1108. The Court has ordered joint administration of these cases.

2. Prior to the Petition Dates, Cingular provided telecommunications services and related services to the Debtors.

3. No Trustee or Examiner has been appointed in these cases.

4. Cingular filed, among others, claim number 5084 (“Claim 5084”) in the amount of \$1,370.20; claim number 5085 (“Claim 5085”) in the amount of \$1,011.99; and claim number 5086, (“Claim 5086”) in the amount of \$7,831.58 against Delphi Corporation.

5. On July 13, 2007, the debtors filed the Objection wherein they objected to Claim 5084 and 5085 as “Insufficiently Documented Claims”, seeking that they be disallowed and expunged on the basis that they do not contain sufficient documentation to permit an understanding of the basis for the claims.

6. In addition, the Objection seeks to modify Claim 5086, by changing it from being asserted against Delphi Corporation to being asserted against Delphi Automotive Systems, LLC, on the basis that the claim was asserted against the wrong Debtor.

### **RESPONSE TO THE NINETEENTH OMNIBUS CLAIMS OBJECTION**

---

<sup>1</sup> Any capitalized terms not defined herein shall have the meanings ascribed to them in the Objection.

7. Cingular does not agree that Claim 5084 and Claim 5085 should be disallowed and expunged as Insufficiently Documented Claims. Cingular has sent, and the Debtors have received invoices and support for both of these claims in the ordinary course of business prior to the Petition Dates which support these claims. Cingular is in the process of gathering its support for these claims and will provide it once again to the Debtors once obtained.

8. Cingular does not object to the modification of Claim 5086 as set forth in the Objection.

**WHEREFORE**, Cingular respectfully requests that the Court (i) deny the Objection with respect to Claim 5084 and Claim 5085, and (ii) grant such other and further relief as proper.

Dated: August 8, 2007

Respectfully submitted,

By: /s/ Eric H. Horn  
Vincent A. D'Agostino, Esq.  
Eric H. Horn, Esq.  
LOWENSTEIN SANDLER PC  
65 Livingston Ave.  
Roseland, NJ 07068  
Phone: 973.597.2500  
Fax: 973.597.2400  
Counsel to Cingular Wireless n/k/a AT&T Mobility  
LLC